



CRIMINAL COMPLAINT

(Electronically Submitted)

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| United States District Court | DISTRICT of ARIZONA |
| United States of America v. Neda Rodriguez DOB: 1979; United States Johnny Bell DOB: 1980; United States Kevin Bernard Wilson DOB: 1965; United States | DOCKET NO. MAGISTRATE'S CASE NO. 21-00501MJ |
| Complaint for violation of Title 8 United States Code § 1324(a)(1)(A) (ii), 1324(a)(1)(A)(v)(I) and 1324(a)(1)(B)(i). | |
| COMPLAINANT'S STATEMENT OF FACTS CONSTITUTING THE OFFENSE OR VIOLATION: COUNT 1 (Felony) On or about October 13, 2021, in the District of Arizona, Neda Rodriguez, Johnny Bell, and Kevin Bernard Wilson , named herein as defendants and conspirators, did knowingly and intentionally combine, conspire, confederate, and agree with other persons, known and unknown, to transport certain illegal aliens, including Jennifer Ciceth Cruz-Gomez, Enrique Hernandez, Jesus Rojas-Sanchez and Mario Salazar-Corona, and did so for the purpose of private financial gain; in violation of Title 8, United States Code, Sections 1324(a)(1)(A) (ii), 1324(a)(1)(A)(v)(I), and 1324(a)(1)(B)(i). COUNT 2 (Felony) On or about October 13, 2021, in the District of Arizona, Neda Rodriguez, Johnny Bell, and Kevin Bernard Wilson , knowing and in reckless disregard of the fact that certain illegal aliens, including Jennifer Ciceth Cruz-Gomez, Enrique Hernandez, Jesus Rojas-Sanchez and Mario Salazar-Corona, had come to, entered and remained in the United States in violation of law, did transport and move said aliens within the United States by means of transportation and otherwise, in furtherance of such violation of law and did so for the purpose of private financial gain; in violation of Title 8, United States Code, Sections 1324(a)(1)(A) (ii) and 1324(a)(1)(B)(i). | |
| BASIS OF COMPLAINANT'S CHARGE AGAINST THE ACCUSED: On or about October 13, 2021, in the District of Arizona (Sonoita), a United States Border Patrol Agent (BPA) responded to assist a Santa Cruz County Sheriff's Office (SCSO) with a vehicle stop related to a suspected human smuggling event. When the BPA arrived, he encountered the driver, identified as Neda Rodriguez , and five passengers. When asked by BPA if they were U.S. Citizens, all five passengers stated they did not have proper documentation to be present in the United States. Rodriguez stated that her purse and belongings were inside of a U-Haul with which she was traveling in tandem. She stated the U-Haul occupants were Johnny Bell and Kevin Wilson . The U-Haul was located headed eastbound on SR-82 and a vehicle stop was conducted. Consistent with Rodriguez' statement, the driver of the U-Haul was identified as Johnny Bell and the passenger was identified as Kevin Wilson . Rodriguez' purse was located in the U-Haul, also consistent with her statement. Material witnesses Jennifer Ciceth Cruz-Gomez, Enrique Hernandez, Jesus Rojas-Sanchez, and Mario Salazar-Corona said that they had arranged to be smuggled into the U.S. for money. All four admitted crossing the U.S. border illegally. Further, all stated that they were first placed into the back of a U-Haul truck and later transferred to the vehicle driven by Rodriguez . Continued on Back | |
| MATERIAL WITNESSES IN RELATION TO THE CHARGE: Jennifer Ciceth Cruz-Gomez, Enrique Hernandez, Jesus Rojas-Sanchez and Mario Salazar-Corona | |
| Detention Requested Being duly sworn, I declare that the foregoing is true and correct to the best of my knowledge. AUTHORIZED BY: AUSA JAA/ri <u>ARW</u> | SIGNATURE OF COMPLAINANT  OFFICIAL TITLE Border Patrol Agent |
| Sworn by telephone <u>x</u> | |
| SIGNATURE OF MAGISTRATE JUDGE ¹⁾  | DATE October 14, 2021 |

¹⁾ See Federal rules of Criminal Procedure Rules 3, 4.1, and 54

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In post-*Miranda* statements, **Rodriguez** stated she was in Nogales attempting to recover a vehicle seized by law enforcement in a separate human-smuggling event. She stated she saw the passengers on the side of the road and decided to give them a ride. Rodriguez had \$934 in cash and she claimed it was from a title loan she received today.

In post-*Miranda* statements, **Wilson** stated he knew **Rodriguez** was traveling to Nogales to smuggle humans. **Wilson** said he failed to stop her from partaking in these actions but said he followed her so he can protect her from getting arrested. Wilson claimed Rodriguez is pregnant with his child and doesn't want his baby to be born in prison. Wilson knew that a smuggling coordinator provided **Rodriguez** with the U-Haul and coordinates for pick-up of the aliens.

In post-*Miranda* statements, **Bell** claimed that he helped his cousin **Rodriguez** and Rodriguez's boyfriend **Wilson** move some furniture. After they were done, **Wilson** offered **Bell** another job picking up noncitizens for money. **Bell** stated that the noncitizens were first loaded into the U-Haul and were later transferred to the Infinity.